

February 22, 2019

Andrew Leichthy PMP
Project Manager
U.S. Army Corps of Engineers, Rock Island District
ATTN: GLMRIS-Brandon Road EIS
Clock Tower Building, P.O. Box 2004
Rock Island, IL 61204-2004

Re: Comments regarding the Great Lakes and Mississippi River Interbasin Study – Brandon Road Draft Integrated Feasibility Study and Environmental Impact Statement – Will County, IL

Dear Andrew,

Please accept these comments submitted on behalf of the undersigned organizations as well as our hundreds of thousands of hunters, anglers, and outdoor recreation enthusiast members across the Great Lakes and Mississippi River basins and nationwide, regarding the U.S. Army Corps of Engineers' (Corps) Final GLMRIS Brandon Road Report and EIS (GLMRIS BR Report).

The undersigned organizations appreciate the opportunity to comment. While we support the GLMRIS BR Report, we have some additional comments, which are highlighted below.

Threat

The Great Lakes are a phenomenal natural resource, a network of five inland seas that span 94,000-square miles of surface area, contain 20 percent of all surface freshwater on the planet and comprise the world's largest freshwater ecosystem. The five lakes — Superior, Michigan, Huron, Erie and Ontario — provide drinking water for 35 million people. In addition, the Great Lakes support a \$7 billion fishery; a \$16 billion tourism industry; waterfowl production areas that support a hunting economy of \$2.6 billion/year; and hunting, fishing, and wildlife observation that generates approximately \$18 billion/year. Combined, these represent a massive outdoor economy that is an integral part of North America's cultural and outdoor heritage.

Today, we are dealing with the worst crisis to face the Great Lakes since the colonization of the lakes by zebra and quagga mussels: the potential invasion of Asian carp. Once the invasive carp invade the lakes, there is no turning back; the damage will be done. Indeed, the urgent need for action is only amplified by the live capture of a silver carp in June 2017 just 9 miles from Lake Michigan on the Lake-side of the electrical deterrents. Just months earlier, a U.S. Geological Service report estimated that Asian carp would have ample food to survive the near-shore areas of the Great Lakes and their connected river mouth and embayment's. Thus, risking the connecting inland streams, rivers and lakes. We have no choice; we have to take action now to stop the Great Lakes' invasion by Asian carp. And we have to take action quickly, while there is still time to save the lakes, and the fish and wildlife that call them home.

Support of the GLMRIS BR Report

Our organizations are supportive of the GLMRIS BR Report, as this plan is the best near-term option for getting additional defenses in place to prevent Asian carp from establishing a population in Lake Michigan and our Great Lakes. This plan includes a gauntlet of technologies (acoustic fish deterrent, engineered channel, electric barrier, and a flushing lock) to prevent Asian carp from moving past the lock, while maintaining navigation for shipping. In addition, we are supportive of removing the water jet measure and replacing it with an air bubble curtain.

Cost Increase

The estimated cost of the project has increased from approximately \$275 million to \$777.8 million. This increase is included for the expedited implementation strategy. We do understand that a large portion of this increase (\$317 million and approximately 66%) is estimated as contingency costs. Given this, the actual cost of this project could be closer to \$460 million. While this is a significant increase in cost, this pales in comparison to the economic risk if Asian carp invade the Great Lakes. Moreover, and as we indicated in the above section, the socio-economic impact of an Asian carp invasion is worth this increased investment.

Implementation Strategies

Given the extreme urgency and the continued threat that Asian carp pose to the Great Lakes, we encourage the Corps to proceed with the expedited strategy to implement this project.

ANS Research and Technology Development

We are glad to see the plan utilize the approach channel and lock as an opportunity to evaluate and optimize ANS controls and maximize the efficiency of the applied technologies. In addition, we are encouraged that the engineered channel provides a platform for future control technologies.

As such, we request that the Corps continue to support and utilize the most updated research on technology control options to deter and reduce the risk of invasive species transferring between the Great Lakes and Mississippi River basins. Given the urgency and high risk of Asian carp and other ANS getting into Lake Michigan, research and development on non-structural and structural control technologies must continue. Additional federal investments moving forward will help inform the Corps as it progresses with the current GLMRIS BR Report and in identifying a two-way solution either at Brandon Road Lock and Dam or at other locations throughout the CAWS.

Non-structural actions must continue

We continue to applaud the current actions from the Illinois Department of Natural Resources, U.S. Fish and Wildlife Service, U.S. Geological Service, and other state and federal agencies in utilizing and deploying aggressive harvest activities along the Des Plaines River and other areas in the CAWS in order to ‘fish down’ the population of Asian carp below the Brandon Road Lock and Dam. We are encouraged to see in this plan that non-structural actions will continue under the jurisdiction of the U.S. Fish and Wildlife Service. This continued action will help reduce the leading edge populations of Asian carp adjacent to the Brandon Road Lock and Dam.

Conclusion

In conclusion, our organizations thank the Corps for the opportunity to submit comments. Preventing Asian carp and other invasive species from transferring between the Great Lakes and Mississippi River is an urgent matter that demands immediate action. We thank the Corps for its efforts in studying ways to address this critical situation. We encourage you to consider our comments and move as fast and efficiently as possible to finalize this plan and submit to Congress on schedule. We need stronger controls in place now in order to prevent Asian carp and other invasive species from continuing to swim closer to - and eventually into - the Great Lakes. Without firm and swift action to stop the further movement of Asian carp and other invasive species, the future of hunting, fishing and our outdoor heritage in the Great Lakes and Mississippi River region is at risk.

Sincerely,

2 % For Conservation

Adams Chapter, Trout Unlimited (MI)

Aldo Leopold Chapter, Trout Unlimited (WI)

American Sportfishing Association

American Woodcock Society

Anglers for Habitat (MN)

Ann Arbor Chapter, Trout Unlimited (MI)

Anchor Bay Fishing Club (MI)

Anglers of the Au Sable (MI)

Antigo Chapter, Trout Unlimited (WI)

Arkansas Wildlife Federation

Ashley Sportsman's Club

Austin Chapter 10 of the Izaak Walton League of America

Backcountry Hunters and Anglers

Bass Anglers Sportsman Society (B.A.S.S.)

The Bass Federation of Michigan

The Big Bay Sportsmen Club (MI)

Blackhawk Chapter, Trout Unlimited (WI)

Brodhead Chapter, Trout Unlimited (PA)

Bowfishing Association of Michigan

Brown County Conservation Alliance (WI)

Bush Lake Chapter Izaak Walton League of America

The Cabinet of Lions of Michigan District 11 B-1 (MI)

Cadillac Sportsman's Club (MI)

Caledonia Sportsman's Club (MI)

Cass County Chapter of the Minnesota Izaak Walton League of America

Central Indiana Chapter, Trout Unlimited

Central Wisconsin Chapter, Trout Unlimited

Challenge Chapter, Trout Unlimited (MI)

Chelsea Rod and Gun Club (MI)

Chestnut Ridge Chapter, Trout Unlimited (PA)

Clear Fork Chapter, Trout Unlimited (OH)
Clear Waters Chapter, Trout Unlimited (WI)
Clinton Valley Chapter, Trout Unlimited (MI)
Coulee Region Chapter, Trout Unlimited (WI)
Columbiana County Federation of Conservation Clubs (OH)
Concord Lions Club (MI)
Congressional Sportsmen's Foundation
Conservation Federation of Missouri
Copper County Chapter, Trout Unlimited (MI)
Delta Waterfowl
Doc Fritchey Chapter, Trout Unlimited (PA)
Dowagiac Conservation Club (MI)
Ducks Unlimited
Dwight Lydell Chapter of the Izaak Walton League of America
Emerald Necklace Chapter, Trout Unlimited (OH)
Falling Timbers Chapter, Trout Unlimited (OH)
Flat River Conservation Club (MI)
The Flint River Chapter of the National Wild Turkey Federation (MI)
Fly Fishers International
Fish and Wildlife Legislative Alliance (MN)
Fishing Charters of Racine (WI)
Fishing League Worldwide
Forbes Trail Chapter, Trout Unlimited (PA)
Fox Valley Chapter, Trout Unlimited (WI)
Frankenmuth Conservation Club (MI)
Frank Hornberg Chapter, Trout Unlimited (WI)
Fred Waara Chapter, Trout Unlimited (MI)
Friends of the Pigeon River (MI)
God's Country Chapter, Trout Unlimited (PA)
Great Lakes Council of Fly Fishers International
Green Bay Chapter, Trout Unlimited (WI)
Green Bay Great Lakes Sport Fishermen
Hammond Bay Area Anglers Association (MI)
Hanover - Horton Area Lions Club (MI)
Hanover - Horton Leos Club (MI)
Harbor Beach Conservation Club (MI)
Harry Laura Nohr Chapter, Trout Unlimited (WI)
Headwaters Chapter, Trout Unlimited (MI)
Hokendauqua Chapter, Trout Unlimited (PA)
Hoosier Coho Club
Huron Pines (MI)
Huron Pointe Sportsmen's Association (MI)
Huron Valley Conservation Association (MI)
Illinois Council of Trout Unlimited
Illinois Division of the Izaak Walton League of America
Indiana Division of the Izaak Walton League of America
Indiana North Coast Charter Association
Indiana Sportsmen Roundtable
Indiana State Council, Trout Unlimited
Indiana Wildlife Federation
Iowa State Council, Trout Unlimited

Iowa Wildlife Federation
Iron Furnace Chapter, Trout Unlimited (PA)
Izaak Walton League of America
Izaak Walton League of America – National Great Lakes Committee
Jackson Cascades Lions Club (MI)
Jackson Host Lions Club (MI)
Kalamazoo Valley Chapter, Trout Unlimited (MI)
Kenosha Sportfishing & Conservation Association (WI)
Kiap-TU-Wish Chapter, Trout Unlimited (WI)
Lake Erie Charter Boat Association
Lake St. Clair Walleye Association
Lakeshore Chapter, Trout Unlimited (WI)
Little Elkhart Chapter, Trout Unlimited (IN)
Little Lehigh Chapter, Trout Unlimited (PA)
Livingston County Wildlife & Conservation Club (MI)
Ludington Charter Boat Association (MI)
Madmen Chapter, Trout Unlimited (OH)
Maple River Wildlife Association (MI)
Marine Retailers of the Americas
Marrinette County Chapter, Trout Unlimited (WI)
Martuch Chapter, Trout Unlimited (MI)
Mason-Griffith Founders Chapter, Trout Unlimited (MI)
Mershon Chapter, Trout Unlimited (MI)
Michigan Association of Convention and Visitors Bureaus
Michigan Association of Pure Bred Dogs
Michigan B.A.S.S. Nation
Michigan Bow Hunters
Michigan Charter Boat Association
Michigan Chapter, Backcountry Hunters and Anglers
Michigan Quality Deer Management Association
Michigan State Chapter of the National Wild Turkey Federation
Michigan Resource Stewards
Michigan Steelhead and Salmon Fishermen’s Association
Michigan State Council, Trout Unlimited
Michigan State United Coon Hunters Association
Michigan Trappers and Predator Callers Association
Michigan United Conservation Clubs
Milwaukee Great Lakes Sport Fishermen
Miller-Van Winkle Chapter, Trout Unlimited (MI)
Minnesota B.A.S.S. Nation
Minnesota Chapter, Backcountry Hunters and Anglers
Minnesota Conservation Federation
Minnesota Division Izaak Walton League of America
Minnesota Trout Unlimited
Montmorency County Conservation Club (MI)
National Marine Manufacturers Association
National Professional Anglers Association
National Wildlife Federation
Neshannock Chapter, Trout Unlimited (PA)
New Alsace Conservation Club (IN)

New Buffalo Rod & Gun Club (MI)
New York B.A.S.S. Nation
New York State Council, Trout Unlimited
North Bear Chapter, Trout Unlimited (IA)
North Jackson Lions Club (MI)
Northeastern Great Lakes Sport Fishermen (WI)
Northwest Indiana Steelheaders
Northwest Michigan Quality Deer Management Association
Northwest Sportfishing Industry Association
Northwoods Chapter, Trout Unlimited (WI)
Oakland County Sportsmen's Club (MI)
Oconto River Chapter, Trout Unlimited (WI)
Ohio B.A.S.S. Nation
Ohio Chapter, Backcountry Hunters and Anglers
Ohio Conservation Federation
Ohio State Council, Trout Unlimited
Ohio Division Izaak Walton League of America
Ontario B.A.S.S. Nation
Owatana Chapter of Izaak Walton League of American (MN)
Ozaukee Great Lakes Sport Fishermen (WI)
Paul H. Young Chapter, Trout Unlimited (MI)
Penns Creek Chapter, Trout Unlimited (PA)
Pennsylvania B.A.S.S. Nation
Pennsylvania Council of Trout Unlimited
Perrin-Lansing Chapter, Trout Unlimited (MI)
Pere-Marquette Chapter, Trout Unlimited (MI)
Pine River Chapter, Trout Unlimited (MI)
Red Cedar Ducks Unlimited (MI)
Ruffed Grouse Society
Saginaw Field and Stream Club (MI)
Salmon Unlimited of Wisconsin
Schrems Chapter, Trout Unlimited (MI)
Shaw-Paca Chapter, Trout Unlimited (WI)
Sheboygan Area Great Lakes Sport Fishermen (WI)
Shehawken Chapter, Trout Unlimited (PA)
Shiawassee Conservation Association (MI)
Silvertip Productions (Ohio)
Southern Wisconsin Chapter, Trout Unlimited
Southeastern Wisconsin Chapter, Trout Unlimited
South Kent Sportsmen's Club (MI)
Spring Creeks Chapter, Trout Unlimited (IA)
Straits Area Sportsmen's Club (MI)
Sterling Sportsman's Association (MI)
Teachin Fishin Anglers Club (MI)
Tiadaghton Chapter, Trout Unlimited (PA)
Tri-County Sportsmen League
True North Trout (MI)
Tomahawk Archers (MI)
Tourism Industry Coalition of Michigan
Trout Unlimited

United Northern Sportsmen (Minnesota)
Upper Black River Council (MI)
U.P. Whitetails Association Inc. (MI)
U.P Whitetails of Marquette County (MI)
Valley Forge Chapter, Trout Unlimited (PA)
Vanguard Chapter, Trout Unlimited (MI)
W.J. McCabe (Duluth) Chapter of the Izaak Walton League of America
Wabasha Chapter, MN Division, Izaak Walton League of America
Walleye 101
Waterfowl USA
Western NY Chapter, Trout Unlimited
Western Pocono Chapter, Trout Unlimited (PA)
Wild Rivers Chapter, Trout Unlimited (WI)
Wisconsin B.A.S.S. Nation
Wisconsin Chapter, Backcountry Hunters and Anglers
Wisconsin Council of Sport Fishing Organizations
Wisconsin Division of the Izaak Walton League of America
Wisconsin Federation of Great Lakes Sport Fishing Clubs
Wisconsin State Council, Trout Unlimited
Wisconsin Wildlife Federation
Wolf River Chapter, Trout Unlimited (WI)